

EXHIBIT A

RICHARDSON, KEVIN

From: FEINSTEIN, AMY
Sent: Thursday, May 20, 2010 1:02 PM
To: RICHARDSON, KEVIN
Subject: FW: Recent Jabbar Collins development

As promised.

-----Original Message-----

From: HYNES, CHARLES J.
Sent: Thursday, May 20, 2010 12:42 PM
To: FEINSTEIN, AMY
Subject: Re: Recent Jabbar Collins development

If the Judge attempts to preclude a retrial we will appeal to the 2nd Circuit. The allegations in Marshal and Del vecchio are nonsense. If Rudin makes them public Mike should confer with a good liable lawyer. Rudin should be told it is Man 1 or a new trial.

Speak with Morty and Jerry and let us prepare an appropriate response to Rudin.

-----Original Message-----

From: FEINSTEIN, AMY
To: HYNES, CHARLES J.
Sent: Thu May 20 12:33:04 2010
Subject: Recent Jabbar Collins development

Kevin received an electronic communication from the Court requiring that they submit a summary of the issues that the parties anticipate will be addressed at the hearing. This is due to the Court by close of business tomorrow. It is his position that we need to admit that we are conceding, which prompts the question about whether we will offer the CPW 3 to the defendant.

He is concerned that if we concede the hearing without the plea agreement Rudin might ask the Court to conduct the hearing anyway. He will attempt to convince Judge Irizarry that our narrow concession is being made to protect Mike and the Office from a full-blown hearing at which he will attempt to prove a pattern of knowing and intentional Brady violations. Such a finding would foreclose us from trying the defendant again. Monique says that Irizarry is unpredictable enough to entertain this.

His motion in limine informs us would attempt to prove the pattern by using the Marshall case. The issue in that case was whether Mike entered into a cooperation agreement with a witness. Judge

Korman did not make a finding in that case, but the minutes are available and Monique says there would be a great deal of fodder for Mike to be cross examined. He also uses the fact that we have been denying that there was a recantation for 4+ years. In addition, he mentions the DeVecchio case without any details, implying misconduct on Mike's part. Of course, since Rudin has sued us before as well as all of the other offices, it is unknown what else he thinks he may know. In addition, if he argues this motion in the record, he will make these statements in open court for the audience and the press to hear.

He also asks the Judge to preclude us from arguing that the witnesses were frightened and that is what led to their unwillingness to cooperate.

Monique will be informing the court that she gave the Judge incorrect information (stating that there was no recantation) .

From: FEINSTEIN, AMY
To: NICOLAZZI, ANNA-SIGGA
Sent: 5/24/2010 9:30:33 PM
Subject: RE: Jabba Collins

The Da is expecting you to be doing it as well.

-----Original Message-----

From: NICOLAZZI, ANNA-SIGGA
Sent: Monday, May 24, 2010 9:13 PM
To: FEINSTEIN, AMY
Subject: Re: Jabba Collins

I will ask Jon (Besunder) in the morning. He took over going through it.

-----Original Message-----

From: FEINSTEIN, AMY
To: NICOLAZZI, ANNA-SIGGA
Sent: Mon May 24 19:49:01 2010
Subject: Jabba Collins

When can we expect your opinion about the case?

From: FEINSTEIN, AMY
To: RICHARDSON, KEVIN
Sent: 5/25/2010 4:13:37 PM
Subject: Re: On the way to you, hearing starts tomorrow at 12pm

The DA wants to see us - I will be outside smoking

-----Original Message-----

From: RICHARDSON, KEVIN
To: FEINSTEIN, AMY
Sent: Tue May 25 16:10:08 2010
Subject: On the way to you, hearing starts tomorrow at 12pm

From: BESUNDER, JON
To: TAUB, KENNETH
CC: NICOLAZZI, ANNA-SIGGA
Sent: 5/25/2010 5:12:27 PM
Subject: FW: Collins

-----Original Message-----

From: RICHARDSON, KEVIN
Sent: Tuesday, May 25, 2010 5:12 PM
To: BESUNDER, JON
Subject: Re: Collins

Hearing is on for tomorrow, I'm in Hynes's office now. I'll come down to you after.

-----Original Message-----

From: BESUNDER, JON
To: RICHARDSON, KEVIN
Sent: Tue May 25 17:01:53 2010
Subject: RE: Collins

What is happening ?

-----Original Message-----

From: RICHARDSON, KEVIN
Sent: Tuesday, May 25, 2010 1:55 PM
To: BESUNDER, JON
Subject: Re: Collins

No, but its not going very well. I'll speak to you when we're done.

-----Original Message-----

From: BESUNDER, JON
To: RICHARDSON, KEVIN
Sent: Tue May 25 11:57:29 2010
Subject: Collins

Any determination from the Court yet ?

From: FEINSTEIN, AMY
To: FERRELL, MONIQUE
Sent: 5/26/2010 9:06:48 AM
Subject: Re: Meeting with the DA

He did and I told the DA

-----Original Message-----

From: FERRELL, MONIQUE
To: FEINSTEIN, AMY
CC: ZMIJEWSKI, JOANNA C
Sent: Wed May 26 09:05:36 2010
Subject: RE: Meeting with the DA

I am in the Office. I will be at the meeting with the DA. If Kevin has not informed you, he received an email from Rudin yesterday informing us that I am now on his witness list.

From: FEINSTEIN, AMY
Sent: Wednesday, May 26, 2010 7:28 AM
To: RICHARDSON, KEVIN; FERRELL, MONIQUE; JOBLove, LEONARD
Cc: ZMIJEWSKI, JOANNA C
Subject: Meeting with the DA

The DA wants to meet with the 3 of you immediately after an 8:30 event he has. I am thinking he should be here slightly before 10. Please be here (his office area) when he arrives at the office.

Amy

From: HYNES, CHARLES J.
To: FEINSTEIN, AMY
Sent: 5/26/2010 2:24:17 PM
Subject: Re: Federal Court

Indeed.

-----Original Message-----

From: FEINSTEIN, AMY
To: HYNES, CHARLES J.
Sent: Wed May 26 14:22:19 2010
Subject: Re: Federal Court

Every once in a while there is a pleasant one.

-----Original Message-----

From: HYNES, CHARLES J.
To: FEINSTEIN, AMY
Sent: Wed May 26 14:17:50 2010
Subject: Re: Federal Court

Surprise!

-----Original Message-----

From: FEINSTEIN, AMY
To: HYNES, CHARLES J.
Sent: Wed May 26 13:59:40 2010
Subject: Federal Court

Kevin mostly got what we wanted. He asked for time until June 8th - the Judge agreed to the adjournment, but Rudin said that the witness Angel Santos was only available tomorrow afternoon. Therefore, Angel Santos will testify tomorrow, as a defense witness and then the hearing will be adjourned until June 8th.

Santos is the witness who was placed in civil jail until he agreed to cooperate. He is also the person that said he was on the telephone with 911, but his voice does not appear on the recording.

From: HYNES, CHARLES J.
To: FEINSTEIN, AMY
Sent: 6/7/2010 8:08:26 PM
Subject: Re: Federal Case

10-4

-----Original Message-----

From: FEINSTEIN, AMY
To: HYNES, CHARLES J.
Sent: Mon Jun 07 18:53:30 2010
Subject: RE: Federal Case

Yes, I agree.

-----Original Message-----

From: HYNES, CHARLES J.
Sent: Monday, June 07, 2010 6:53 PM
To: FEINSTEIN, AMY
Subject: Re: Federal Case

Nice to have good news to counter balance the unpleasant.

-----Original Message-----

From: FEINSTEIN, AMY
To: HYNES, CHARLES J.
Sent: Mon Jun 07 18:49:44 2010
Subject: RE: Federal Case

Yes, very good news.

-----Original Message-----

From: HYNES, CHARLES J.
Sent: Monday, June 07, 2010 6:49 PM
To: FEINSTEIN, AMY
Subject: Re: Federal Case

Great news

-----Original Message-----

From: FEINSTEIN, AMY
To: HYNES, CHARLES J.
Sent: Mon Jun 07 18:37:52 2010
Subject: Federal Case

Kevin and Rudin had a conference call with the Judge. The only mention of continuing with the hearing was made by the Judge when she said that they should be ready if things fall apart and the parties cannot agree about the wording of the Order. Kevin says that they are very close on the wording and that they will agree. They are due in Court tomorrow at 10:30.

From: FEINSTEIN, AMY
To: HYNES, CHARLES J.
Sent: 6/9/2010 7:56:25 AM
Subject: RE: Today

The Law Journal headline is bad - "Judge orders Inmate's Release, Blasts DA's Lack of Remorse". The story is also bad - quoting the judge using the phrase "shameful" on two occasions. Similar to the Times, but it does not have quotes from other lawyers. It does have your statement at the end calling Mike a very, very principled lawyer. Budge story is also in the Law Journal - am about to read it.

-----Original Message-----

From: HYNES, CHARLES J.
Sent: Wednesday, June 09, 2010 7:45 AM
To: FEINSTEIN, AMY
Subject: Re: Today

Yes but it is a one day story.

-----Original Message-----

From: FEINSTEIN, AMY
To: HYNES, CHARLES J.
Sent: Wed Jun 09 07:44:16 2010
Subject: RE: Today

I agree - I thought the Times was particularly rough on Mike. The words maybe fancier, but it read more like a Post article to me.

-----Original Message-----

From: HYNES, CHARLES J.
Sent: Wednesday, June 09, 2010 7:43 AM
To: FEINSTEIN, AMY
Subject: Today

The Post and News weren't particularly bad but the Times really went out of its way to trash Mike and our Office. That none of them bothered to deal with the fact the only claims of misconduct was our discovery of it 16 years later which we promptly turned over to the defense attorney and the Court is not at all surprising.